



**State of New Hampshire
DEPARTMENT OF ENVIRONMENTAL SERVICES**

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September 2, 2003

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**AMENDMENT TO
LETTER OF DEFICIENCY
No. WMD 03-06**

Alltex Uniform Rental Services, Inc
P.O. Box 5246
Manchester, New Hampshire 03103

Attn: Alan Cobb, President

**Re: Alltex Uniform Rental Services, Inc.
Manchester, New Hampshire
EPA ID No. NHD001422351**

Dear Mr. Cobb:

On January 23, 2003, the Department of Environmental Services, Waste Management Division (DES) conducted an inspection of Alltex Uniform Rental Services, Inc. (Alltex). The purpose of the inspection was to determine Alltex's compliance status relative to RSA Ch. 147-A and the New Hampshire Hazardous Waste Rules Env-Wm 100-1100.

As a result of the inspection, DES issued Letter of Deficiency No. WMD 03-06 (LoD), in conjunction with Administrative Fine by Consent No. AF 03-013 (AFC) to Alltex on May 13, 2003. DES personnel subsequently met on June 5, 2003 to discuss the LoD and the AFC with Alltex representatives Alan Cobb and Robert Hippert and their consultant Ron Breton of GZA. Based on the June 5, 2003 meeting, DES has determined that Alltex was not in violation of Env-Wm 509.02(c) and was not deficient in the outdoor hazardous waste storage area requirements as cited in deficiency No. 6 in the LoD. At the time of the inspection, the outdoor hazardous waste storage area was completely enclosed by a natural or artificial barrier, had a means to control entry and had a sign posted with the words: "Danger – Unauthorized Personnel Keep Out".

Accordingly, the LoD is hereby amended to delete the following deficiency from the list of deficiencies documented in the LoD:

6. Env-Wm 509.02(c) – Outdoor Hazardous Waste Storage Area Requirements

At the time of inspection, one (1) roll-off container of hazardous waste filter cake was stored in the outdoor hazardous waste storage area located behind 341 Taylor Street. The outdoor hazardous waste storage area was not completely enclosed by a natural or artificial barrier, did not have a means to control entry and did not have a sign posted with the words: "Danger – Unauthorized Personnel Keep Out".

Env-Wm 509.02(c) requires full quantity generators to provide the following security measures at all outdoor storage areas:

An artificial or natural barrier, such as a fence in good repair, which completely surrounds the hazardous waste storage area to prevent the unauthorized or unknowing entry of persons or livestock;

2. A means to control entry, at all times, through gates or other entrances to the hazardous waste storage area such as an attendant, television monitor, locked entrance or controlled roadway access to the area; and
3. A sign with the legend, "Danger - Unauthorized Personnel Keep Out", at each entrance to the hazardous waste storage area. Existing signs with other than the aforementioned legend may be used if the legend on the sign indicates that only authorized personnel are allowed to enter the area and that entry can be dangerous.

DES requests that Alltex provide the security measures required by Env-Wm 509.02(c) at the outdoor hazardous waste storage area.


Alltex is not required to take any further action related to deficiency No. 6 (Env-Wm 509.02(c) Outdoor Hazardous Waste Storage Area Requirements) in the LoD.

The State of New Hampshire Hazardous Waste Rules, as well as much other useful information, can be obtained from DES's website at <http://www.des.state.nh.us/hwcs/>, or by contacting the Public Information Center at (603) 271-2975.

As a service to New Hampshire's hazardous waste generators, we maintain a Hazardous Waste Assistance Hotline which is available for you to contact our knowledgeable staff of hazardous waste inspectors. Our hazardous waste staff is available to answer your questions concerning the New Hampshire Hazardous Waste Rules and the compliance issues which affect your hazardous waste management program. The technical assistance available through the Hotline includes fact sheets that pertain to the management and recycling of specific wastes, summary sheets of specific sections of the Hazardous Waste Rules, copies of EPA and New Hampshire hazardous waste policy or regulatory interpretation letters that may benefit your operation, and networks with other state or federal agencies to answer your questions on a national level. The Hotline is available Monday through Friday, 8:00 AM to 4:00 PM toll-free at (866) HAZ-WAST or at (603) 271-2942.

We regret the error and apologize for any inconvenience it may have caused. Should you have any questions regarding this letter, please contact the lead inspector, Robert Bishop or John J. Duclos, Supervisor of the Hazardous Waste Compliance Section, at 271-2942. Thank you for your continued cooperation.

Sincerely,


Kenneth W. Marschner, Administrator
Waste Management Programs
Waste Management Division

cc: DB/RCRA/LOD/Archives
Philip J. O'Brien, Ph.D., P.G., Director, WMD
✓ Gretchen Rule, Esq., Administrator, DES Legal Unit
Robert Hippert, EH&S Coordinator, Alltex

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